

April 6, 2021

VIA ECF and E-MAIL

The Honorable Edgardo Ramos
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 619
New York, New York 10007

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Re: *Anthem, Inc. v. Express Scripts, Inc.*, Civil Action No. 16 Civ. 2048

Dear Judge Ramos:

We write on behalf of Plaintiff Anthem, Inc. and Defendant Express Scripts, Inc. (“ESI”) pursuant to Your Honor’s directive at the April 2, 2021 Pre-Motion Conference that the parties jointly submit a proposed Revised Civil Case Discovery Plan and Scheduling Order (“Proposed Revised Schedule”).

The attached Proposed Revised Schedule extends the time for completion of expert discovery by 60 days—from April 16, 2021 to June 15, 2021—and makes corresponding changes to subsequent deadlines. ESI consents to this extension. The parties have proposed fifteen previous extensions of the Schedule in this proceeding, and the Court so ordered the proposed revised schedules in those instances. The parties respectfully request that the Court so order the attached Proposed Revised Schedule.

Respectfully submitted,

/s/ Glenn M. Kurtz
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cc: All Counsel of Record (via ECF)